accordingly does not require that the first method be actually performed. However, the term "first method" is submitted as being sufficiently clear to one of ordinary skill in the art of classical object-oriented technology to which the claim is directed. The claim recites an "object" may be a unique instance of a data structure that's defined according to the template provided by its class. See enclosed, a copy of the definition of object, provided by the Online Dictionary of Computing. Each object may have its own values for the variables belonging to its class, i.e. its data and can respond to the methods defined by its class. Thus, when claim 1 recites, "associating first image data and first method as part of an image object", the term "first method" is understood by one of ordinary skill in the art as referring to a programming procedure or routine. Accordingly, the reference to "first method" in claim 1, as being associated with an image object, makes it clear that the limitation may be a procedure or routine that is stored in the machine-readable medium in association with the object, as recited in claim 1. Accordingly, reconsideration and withdrawal of the indefiniteness rejection of claim 1 is respectfully requested.

Independent claim 7 refers to the transfer of an image object having first image data associated with a first method. Thus, as was explained above in connection with claim 1, what's being transferred is a procedure or routine. However, in contrast to claim 1, claim 7 recites the additional operation of the abstract machine executing the first method. Accordingly, in claim 7, performance of the first method is specifically recited.

Claim 10 recites an imaging device having a memory for storing an image object, where the image object has first image data and first image method. Similar to claim 1, claim 10 does not require that the first method be actually executed.

The remaining dependent claims 2-4, 8, 9, and 11-19 depend from their rejected base claims, and, for the same reasons, are submitted as not being indefinite. Accordingly, reconsideration and withdrawal of the indefiniteness rejection of the claims is respectfully requested.

Claims 1-14, 16, and 19-21 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,982,994 issued to Mori al. ("Mori"). Applicant respectfully disagrees with the rejection for the following reasons.

To anticipate a claim, a reference must disclose every element of the claim. In this case, claim 1 is directed to an article of manufacture having a machine-readable medium with instructions that, when executed by a processor, cause the association of first image data and first method to an image object. The first method is to be executed by an abstract machine to obtain first translated image data, based upon the first image.

The invention being claimed here is suitable for the packaging of digital images that may be in different native formats, for translating them into a common format. The scheme in claim 1 allows different types of imaging devices that store digital images in different native formats to communicate with a host system, to allow the viewing or processing of such images in a common format aboard the host. Such a mechanism avoids having to load a bulky device-specific driver, such as a Twain driver, into the host system to translate the different types of images. Thus, referring to claim 1, data for an image is made part of an object within the meaning of classical object-oriented

technology. In addition, a method is made part of the same object. This method is to be executed by an abstract machine such as a Java virtual machine, to obtain translated image data based upon the image data that's part of the object. Thus, images are communicated as part of objects having an associated method for translating the image into a common format. Mori does not teach or suggest such a scheme.

Mori discloses a network printer which is faced with a problem of printing data that is described in different formats in different PCs produced by different makers. The printer starts an emulation program that's provided in the printer (e.g. Postscript) which is designated by information received from a client. Mori, col. 7, lines 5-9. This emulation program is used to interpret the printing data correctly. Mori, col. 2, lines 58-64. In Fig. 5E of Mori, a frame is sent by the client to the network printer and that contains an emulation designation. Mori, col. 10, lines 7-11. However, nowhere does Mori teach or suggest an object-oriented framework in which a method for translating an image in the object is sent along with the image, to an image processing device. In addition, no method for translating image data is being transferred from the client to the printer in Mori. Rather, Mori relies upon emulation programs that are resident in the printer to interpret different printing data. Accordingly, Applicant respectfully submits that Mori does not anticipate Applicant's claim 1.

As to claim 5, this claim recites an article of manufacture having a machine-readable medium with instructions that, when executed by a processor, cause a data processing system to be configured to receive multiple objects from different imaging devices, where the objects have first and second image data and corresponding

methods. An abstract machine is to execute these methods, to obtain translated image data based upon the data received in each object.

Applicant respectfully submits that Mori does not teach or suggest that the printer is to receive first and second objects from first and second imaging devices, respectively, where the objects have first and second image data and corresponding methods. In addition, Mori does not teach or suggest an abstract machine that executes object methods, to obtain translated image data based upon the image data in each object. Mori discloses an interpretation program such as Postscript being executed by certain hardware in the printer. This, however, is not the same as an abstract machine executing a method of an object. An abstract machine may be a processor design which is not intended to be implemented as hardware, but is the notional executor of a particular intermediate language that's used in a compiler or interpreter. See the enclosed paper copies of Web sites giving definitions for "method" and "abstract machine" provided by the Online Dictionary of Computing. Accordingly, Applicant submits that claim 5 is not anticipated by Mori.

Claim 7 is directed to a method in which an abstract machine in a processing system is executing the first method of an image object for generating first translated image data based upon first image data of the object. Thus, for the reasons given above in support of claim 5, claim 7 is also not anticipated by Mori.

Claim 10 is directed to an imaging device having an image sensor and memory, in which the memory is to store an image object having first image data related to sensor data and an image method to be executed by an abstract machine. Thus, for the reasons given above in support of claim 1, claim 10 is not anticipated.

Turning now to claim 20, this independent claim is directed to a data processing system having a processor and memory, wherein the memory is configured to perform operations substantially as recited in claim 5. Accordingly, claim 10 is not anticipated at least for the reasons given above in support of claim 5.

The remaining dependent claims are submitted as not being anticipated for the reasons given above in support of the base claims from which they depend.

Claims 15, 17, and 18 stand rejected as being obvious in view of Mori and U.S. Patent No. 5,873,077 issued to Kanoh et al. ("Kanoh"). Applicant respectfully disagrees with the rejection, at least for the reasons given above in support of claim 10 from which claims 15, 17, and 18 depend.

In sum, a good faith attempt has been made to explain the differences between Applicant's claims and the relied upon reference of Mori. In view of such differences, the rejection of Applicant's claims is deemed improper, such that reconsideration and withdrawal of the rejection is respectfully requested.

Respectfully submitted,

BLAKELY SOKOLOFF TAYLOR & ZAFMAN LLP

Dated: September 15, 2000

Farzad E. Amini, Reg. No. 42,261

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, California 90025
(310) 207-3800

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on September 15, 2000.

Jean Svoboda 9.15.00

Date